

Decision 16-10-013 October 13, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities' Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations.	Rulemaking 12-06-013 (Filed June 21, 2012)
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**DECISION GRANTING INTERVENOR COMPENSATION TO
THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC.
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-07-001**

Intervenor: Interstate Renewable Energy Council, Inc.	For contribution to Decision (D.) 15-07-001
Claimed: \$280,239.50	Awarded: \$209,169.85 (~25.36% reduction)
Assigned Commissioner: Michael Picker	Assigned ALJ: Jeanne McKinney

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 15-07-001 makes significant changes to residential rates, including (1) reducing the number of rate tiers from four to two; (2) reducing the rate differential between the lowest and uppermost tier to 1:1.25; (3) creating a super user surcharge for customers with usage over 400% of baseline; (4) moving toward default time-of-use rates in 2019; and (5) rejecting fixed charge proposals in favor of adopting a \$10 minimum bill.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	October 24, 2012	Verified.
2. Other specified date for NOI:		
3. Date NOI filed:	November 26, 2012	Verified.
4. Was the NOI timely filed?	Yes, Interstate Renewable Energy Council, Inc. (IREC) timely filed the notice of intent to claim	

		intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.12-06-013	Verified.
6. Date of ALJ ruling:	February 25, 2013	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, IREC demonstrated appropriate status as a customer.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.12-06-013	Verified.
10. Date of ALJ ruling:	February 25, 2013	Verified.
11. Based on another CPUC determination (specify):	See Notes	
12. Has the Intervenor demonstrated significant financial hardship?		Yes, IREC demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.15-07-001	Verified.
14. Date of issuance of Final Order or Decision:	July 13, 2015	Verified.
15. File date of compensation request:	June 29, 2016	Verified.
16. Was the request for compensation timely?		Yes, IREC timely filed the request for compensation.

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor’s Comment(s)	CPUC Discussion
15	IREC has continued to monitor R.12-06-013, but has chosen to not participate further and will not be filing a request for any other Decision issued in this docket. IREC’s decision to delay filing this request was, in part, due to the pendency of the Commission’s decision in Docket 14-07-002 (NEM 2.0). Consistent with its arguments in this case, IREC expected that the Commission might preserve a two-tier inverted block	Agreed. IREC timely filed the request for compensation.

	<p>rate structure for residential net metering customers, a structure which IREC has consistently advocated to be the Commission's policy across both dockets.</p> <p>Under Commission Rules of Practice and Procedure ("Rule") 17.3, a request for intervenor compensation may be filed at any point after a decision resolving issues to which an intervenor made a substantial contribution. Rule 17.3 provides that the ultimate deadline for filing a request for compensation for substantial contribution is within 60 days of the filing of a decision closing the proceeding. R.12-06-13 remains an active docket and IREC is making this request at this time pursuant to Rule 17.3. [See D.16-06-022]</p>	
#9-11	<p>Since this proceeding began, IREC modified its articles of incorporation to shift from away from a formal membership structure to a structure where individuals may still participate in IREC's efforts by making financial contributions to the organization. IREC's new articles (filed as Attachment 2 in an amended NOI filed in Docket No. R.11-09-011 on December 17, 2014) explicitly provide that IREC may participate in regulatory proceedings on behalf of residential customers, but do not otherwise change the goals and purpose of the organization. Therefore, the ALJ's conclusion in the February 25, 2013 ruling remains valid that "IREC's estimated cost of participating in this proceeding far exceeds the economic interest of those whose views it promotes or the economic interests of IREC as an organization." [p.30].</p>	Agreed. IREC is eligible for intervenor compensation in the present proceeding.

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. Negative impact of fixed customer charges on existing and prospective net metering customers.</p> <ul style="list-style-type: none"> IREC's analysis showed that fixed customer charges have a disproportionate impact on net metering customers and create a relative disincentive for conservation and distributed generation. [IREC's July 13, 	<p>D.15-07-002 at p. 57 ("Based on the studies and analysis presented in this proceeding, it is clear that the proposed rate design changes will reduce the structural incentives for conservation present in the existing rates to some degree.").</p>	<p>Verified. D.15-07-001 at p. 57.</p>

2013 Opening Comments].		
<p>2. Superiority of a minimum bill approach to a fixed customer charge in supporting the Commission’s policy of encouraging conservation and customer investment in distributed generation.</p> <ul style="list-style-type: none"> • It its March 10, 2014, Phase 1 Prehearing Statement, IREC recommended that the Commission examine a minimum bill as a means of meeting the objective of ensuring fair recovery of fixed costs without the down-side effects of instituting a fixed customer charge. [pp. 2, 5]. Mark Fulmer’s direct testimony also restated and incorporated these arguments by reference in his direct testimony at p. 22. • IREC argued that the utilities were inappropriately including costs that vary with customer usage in the category of costs that will be recovered through the monthly fixed charge. [IREC Opening Brief at pp. 21-23] • IREC’s January 26, 2015 reply brief expounded on Commission precedent related to prior customer rejection of fixed charges. IREC showed that Commission precedent supports its proposition that such charges disproportionately impact low-usage customers, an impact which extends to customers who become lower-usage customers by virtue of NEM. [IREC Reply Brief at pp. 16-20]. • IREC argued that it is 	<p>D.15-07-001 at p. 218 (noting that the “minimum bill therefore allows the continued recovery of most utility costs through the volumetric rate.”) (i.e., does not weaken the volumetric price signal to the same extent as a fixed customer charge).</p> <p>D.15-07-001 at p. 214 (“we agree with parties that the IOUs failed to articulate a clear and consistent methodology to identify and calculate fixed costs.”); at p. 217 (“based on the record in this proceeding it is premature to determine the scope and amount of a fixed charge.”).</p> <p>D.15-07-001 at p. 216 (acknowledging parties comments on Commission precedent rescinding a customer charge for SDG&E and agreed that understandability played into the decision to go with a minimum bill approach over a fixed charge approach for the immediate future).</p>	<p>Verified.</p>

<p>reasonable to read the cap for fixed charges to apply to a minimum bill. The Commission did not agree with IREC’s legal reasoning, but adopted the same result after a thorough consideration of IREC’s legal arguments in the decision.</p>	<p>D. 15-07-001 at p. 227 (noting that the disagreement between parties on the scope of fixed costs warrants using the fixed charge cap of \$10 for minimum bills, even though the Commission does not believe the cap applies to minimum bills as a matter of law).</p>	
<p>3. Importance of maintaining a significant tier differential within a two-tier rate structure to send a strong conservation price signal.</p> <ul style="list-style-type: none"> • IREC’s March 10, 2014, Phase 1 Prehearing Statement recommended a 2:1 tier differential ratio (for a two-tiered structure) to preserve the price signal to customers to conserve and invest in distributed generation. • Mark Fulmer’s direct testimony for IREC (at p. 4) discussed how there can be a marginal cost basis for tiered rates, where the upper tier reflects that cost of marginal resources. • Mark Fulmer’s direct testimony (at pp. 5-7) also addressed how historic tier differentials (pre-energy crisis) are inappropriate to rely upon in setting current rates. • Mark Fulmer’s direct testimony (at p.18) also modeled how reducing tier differentials from 100% to 20% would impact solar customers, showing a negative impact of over 10% in loss of system value as a result of reducing the tier differential by that amount. • Mark Fulmer’s rebuttal testimony clarified that a 	<p>D.15-07-001 at p. 63 (acknowledging that there are customers that respond to marginal costs of an upper tier rate and stating the need for a conservation signal for these high usage customers).</p> <p>D.15-07-001 at p.112, (While IREC’s “marginal cost” basis is not adopted for purposes of the two tier differential, the underlying principle and argument informs the concept that super users should be responsible for paying a higher marginal rate through the special surcharge).</p>	<p>Verified.</p>

<p>two-tiered structure, with a high-differential, would provide the best balance between “understandability and proper incentives.” [p. 3].</p>		
<p>4. Positive correlation of income and usage</p> <ul style="list-style-type: none"> IREC supported and reinforced the position of TURN throughout this proceeding that there is a strong correlation between income and electricity usage. IREC’s Comments on the Energy Division’s Phase 1 proposal elaborated that low-income customers tend to use less and, thus, face marginal rates in the 1st or 2nd Tiers. As IREC noted, “without steep tiers and with more modest CARE discounts, the relationship between income and consumption will be stronger, and that should be acknowledged.” [IREC Comments on Energy Division’s Phase 1 Proposal at p. 4]. 	<p>D.15-07-001 at p. 75 (noting IREC’s critique that PG&E did not perform its analysis by comparing customers within climate zones and did not strike NEM customers from the set).</p> <p>D.15-07-001 at p.76 (acknowledging that there is a “general positive correlation between income and usage”)</p>	<p>Verified.</p>
<p>5. Quantitative basis to evaluate the impacts of rate design on NEM and the conservation price signal that drives NEM.</p> <ul style="list-style-type: none"> IREC’s consultant, MRW & Associates, developed a tool for evaluating the impact of rate design proposals on NEM customers, using large customer data sets of actual customer usage. IREC’s consultant critiqued SCE’s NEM evaluation tool and provided feedback to the utility on how it could be improved. [IREC’s July 12, 2013 Opening Comments]. <i>See also</i> Direct Testimony of Mark Fulmer on behalf of IREC at pp. 17-21 	<p>D.15-07-001 at p. 57 (noting that the studies and analysis presented in this proceeding made clear that the structural changes to rates will “reduce the structural incentives for conservation present in existing rates to some degree.”)</p>	<p>Verified.</p>

<p>6. Importance of a reasonable transition period.</p> <ul style="list-style-type: none"> • Since the outset of the proceeding, IREC emphasized the importance of phasing and transitioning any major changes to the residential rate structure. [See, e.g., IREC's July 12, 2013 Opening Comments; IREC's December 23, 2013 Protest of Interim Rate Design Proposals at p.5] • IREC successfully protested the IOUs' interim rate proposals, where IREC demonstrated that SCE's proposal would increase bills by more than 30% for over a third of inland NEM customers and for more than half of coastal customers with small solar array. [IREC's December 23, 2013 Protest at p. 5]. The IOUs were ordered to refile their interim proposals with less drastic changes. 	D.15-07-001 at p. 115	Verified.
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes.	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes.	Verified.
c. If so, provide name of other parties: Vote Solar, Sierra Club, Solar Energy Industries Association, The Alliance for Solar Choice, California Solar Energy Industries Association		Yes.

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013; public resources), which was approved by the Governor on September 26, 2013.

<p>d. Intervenor’s claim of non-duplication:</p> <p>IREC worked diligently with other aligned parties to reduce duplication, holding frequent, weekly at times, coordination calls with other parties addressing residential solar in this proceeding. For example, IREC presented analysis at the outset of this proceeding that modeled the impact of increased fixed customer charges on net metering customers’ bills. In Phase 2, other coordinating parties took the initiative to model the investor-owned utilities (“IOUs”) proposals and IREC did not present repetitive economic modeling. IREC limited its participation (comments and testimony) to issues directly relevant to its primary objective to ensure that the Commission gave due consideration to the impact that any structural rate design changes would have on existing and prospective net metering customers. Given the close coordination with parties that were addressing time-of-use (“TOU”) issues, IREC chose not to address those topics at length to avoid duplication.</p>	<p>Yes. Multiple parties with intersecting interests participated in this proceeding. IREC carefully coordinated with other intervenors to avoid excessive duplication. The efforts undertaken by IREC in the proceeding are fully compensable by the Commission, since IREC’s contributions supplemented and complemented the showings of other parties.</p>
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C. Additional Comments on Part II:

#	Intervenor’s Comment	CPUC Discussion
A.	<p>IREC’s entire participation in this proceeding was focused on encouraging the Commission to include the impact of residential rate design on current and prospective net metering customers within the scope of its policy decisions. IREC’s work in the initial stages of Phase 1 was part of its cumulative contribution in ensuring that impacts on net metering customers were given due consideration. [See IREC’s February 14, 2013 Comments on the ALJ’s January 31, 2013 Workshop Ruling.] Accordingly, IREC’s early contributions in this proceeding provide a cumulative contribution that is most relevant to D.15-07-001, where the Commission acknowledged the need to consider the impact of structural rate changes on net metering customers.</p> <p>IREC also participated in settlement discussions in good faith and worked collaboratively with all parties to try to find common ground.</p>	Verified.

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

<p>a. Intervenor's claim of cost reasonableness:</p> <p>IREC's level of participation in this proceeding reflects a reasonable balance of the need to engage outside expert consultants to address technical matters and the ability to use internal policy expertise to advocate for IREC's primary issue. IREC's participation was targeted and IREC worked diligently to keep costs of participation as low as possible. The significance of residential rate design to the market for rooftop solar is extremely high in California, as a continuation of long-held policy directive to encourage these customer activities. Thus, the work of IREC on this aspect of the case is reasonable relative to the significance of the policy impacts that flow from the Commission's orders in D.15-07-001.</p>	<p>CPUC Discussion</p> <hr/> <p>Verified.</p>
<p>b. Reasonableness of hours claimed:</p> <p>IREC's labor hours were carefully constrained to perform the tasks necessary to meet IREC's primary objective. Because IREC identified its primary objective in this proceeding at the outset, IREC was able to limit the work of its consultants and attorneys to address those issues most relevant to the net metering focus. Of course, due to the insufficiency of utility-created NEM bill impact calculators, IREC's consultants had to devote a significant amount of time and analysis to develop IREC's own model. While IREC reviewed all materials in this docket, IREC effectively relied on its coordination with other parties to reduce the number of hours that its experts and attorneys needed to spend to effectively participate in this portion of the proceeding. IREC followed the directive of the ALJ at the beginning of this proceeding to proactively work to reduce duplication of efforts. These efforts result in a modest number of hours spent on this proceeding compared to many other participants, which reflects IREC's success in targeting its efforts and constraining the use of resources.</p>	<p>Verified, <i>but see</i> CPUC Disallowances and Adjustments, below.</p>
<p>c. Allocation of hours by issue:</p> <p>Within the broader umbrella of rate design issues that impact net metering customers, there are three primary issues that account for the time of IREC's consultants, advocates, and attorneys:</p> <p>ISSUE A: Impact of Rate Design on Net Metering Program (and development of IREC's NEM bill impact model)</p> <ul style="list-style-type: none"> Percentage of Total hours: 61.6% <p>ISSUE B: Fixed Customer Charge and Minimum Bill</p> <ul style="list-style-type: none"> Percentage of Total hours: 18.7% <p>ISSUE C: Tier Differential</p> <ul style="list-style-type: none"> Percentage of Total hours: 19.7% 	<p>Verified.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$ [A]	Total \$
Thad Culley	2012	8.9	\$190	D.15-05-020	\$1,691	8.90	190.00	1,691.00
Thad Culley	2013	85	\$195	D.15-05-020	\$16,575	85.00	195.00	16,575.00
Thad Culley	2014	57.1	\$200	D.15-05-020	\$11,420	57.10	200.00	11,420.00
Thad Culley	2015	37.8	\$200	D.15-05-020	\$7,560	37.80	200.00	7,560.00
Jason Keyes	2012	14.3	\$300	See Att. 3	\$4,290	14.30	300.00	4,290.00
Jason Keyes	2013	44.2	\$300	See Att. 3	\$13,260	44.20	305.00 See Res. ALJ-287.	13,481.00
Jason Keyes	2014	165.6	\$300	See Att. 3	\$49,680	165.60	315.00 See Res. ALJ-303.	52,164.00
Jason Keyes	2015	55	\$300	See Att. 3	\$16,500	55.00	315.00 See Res. ALJ-308.	17,325.00
Steve McClary	2012	16.3	\$300	D.14-10-044	\$4,890	8.10 [1]	300.00	2,430.00
Steve McClary	2013	67.8	\$300	D.14-10-044	\$20,340	33.90	305.00 See Res. ALJ-287.	10,339.00
Steve McClary	2014	32.3	\$300	D.14-10-044	\$9,690	16.15	315.00 See Res. ALJ-303.	5,087.25
Mark Fulmer	2014	104.4	\$275	D.14-10-044	\$28,710	52.20	290.00 See Res. ALJ-281, 287, and 303.	15,138.00
Mark Fulmer	2015	5.1	\$275	D.14-10-044	\$1,402.50	2.55	290.00	739.50
Briana	2013	215.25	\$135	D.14-06-049	\$29,058.75	107.63	135.00	14,530.05

Kobor								
Briana Kobor	2014	67.2	\$135	D.14-06-049	\$9,072	33.60	140.00 <i>See Res. ALJ-303.</i>	4,704.00
Julia Getchell	2013	153.5	\$135	See Att. 3	\$20,722.50	76.75	135.00	10,361.25
Julia Getchell	2014	.5	\$135	See Att. 3	\$67.50	0.25	140.00 <i>See Res. ALJ-303.</i>	35.00
Naina Gupta	2014	10.5	\$135	See Att. 3	\$1,417.50	5.25	135.00	708.75
Parjanya Rijal	2014	197.25	\$135	See Att. 3	\$26,628.75	98.63	135.00	13,315.05
Laurel Passera	2014	29.7	\$80	See Att. 3	\$2,376	29.70	80.00	2,376.00
Laurel Passera	2015	51.3	\$80	See Att. 3	\$4,104	51.30	80.00	4,104.00
Subtotal: \$279,455.50						Subtotal: \$208,373.85		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Thad Culley	2012	3.2	\$95	D.15-05-020	\$304.00	3.20	95.00	304.00
Thad Culley	2016	4.8	\$100	D.15-05-020	\$480.00	4.80	102.50 <i>See Res. ALJ-329.</i>	492.00
Subtotal: \$784.00						Subtotal: \$796.00		
TOTAL REQUEST: \$280,239.50						TOTAL AWARD: \$209,169.85		
**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.								
**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?)
Thadeus B. Culley	December 01, 2010	271602	No
Jason B. Keyes	N/A (Licensed in Washington)	WA Bar #36947	No

C. CPUC Disallowances and Adjustments:

Item	Reason
[A]	The Commission applied the adopted cost-of-living adjustments (COLAs) to the claimed hourly rates of IREC's representatives.
[1]	The timesheets submitted for Kobor, McClary, Fulmer, Getchell, Gupta, and Rijal consist solely of vague tasks related to the issues addressed by IREC. The Commission requires specificity when making determinations of intervenor compensation. <i>See e.g.</i> , D.10-02-020 and D.11-05-043. In addition, the work demonstrates internal duplication as the entries often overlap in such areas as "technical analysis" and "research." The Commission reduces the claimed hours for the above-named individuals by 50%.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

1. Interstate Renewable Energy Council, Inc. has made a substantial contribution to D.15-07-001.
2. The requested hourly rates for Interstate Renewable Energy Council, Inc.'s representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$209,169.85.

CONCLUSION OF LAW

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Interstate Renewable Energy Council, Inc. shall be awarded \$209,169.85.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay Interstate Renewable Energy Council, Inc. their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2015 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning September 12, 2016, the 75th day after the filing of Intervenor's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated October 13, 2016, at Long Beach, California.

MICHAEL PICKER
President
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
LIANE M. RANDOLPH
Commissioners

Carla J. Peterman, being necessarily
absent, did not participate.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:	D1610013	Modifies Decision?	
Contribution Decision(s):	D1507001		
Proceeding(s):	R1206013		
Author:	ALJ McKinney		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Interstate Renewable Energy Council, Inc. (IREC)	09/09/14	\$280,239.50	\$209,169.85	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Thad	Culley	Attorney	IREC	\$190	2012	\$190.00
Thad	Culley	Attorney	IREC	\$195	2013	\$195.00
Thad	Culley	Attorney	IREC	\$200	2014	\$200.00
Thad	Culley	Attorney	IREC	\$200	2015	\$200.00
Thad	Culley	Attorney	IREC	\$200	2016	\$205.00
Jason	Keyes	Attorney	IREC	\$300	2012	\$300.00
Jason	Keyes	Attorney	IREC	\$300	2013	\$305.00
Jason	Keyes	Attorney	IREC	\$300	2014	\$315.00
Jason	Keyes	Attorney	IREC	\$300	2015	\$315.00
Steve	McClary	Expert	IREC	\$300	2012	\$300.00
Steve	McClary	Expert	IREC	\$300	2013	\$305.00
Steve	McClary	Expert	IREC	\$300	2014	\$315.00
Mark	Fulmer	Expert	IREC	\$275	2014	\$290.00
Mark	Fulmer	Expert	IREC	\$275	2015	\$290.00
Briana	Kobor	Expert	IREC	\$135	2013	\$135.00
Briana	Kobor	Expert	IREC	\$135	2014	\$140.00
Julia	Getchell	Expert	IREC	\$135	2013	\$135.00
Julia	Getchell	Expert	IREC	\$135	2014	\$140.00
Naina	Gupta	Expert	IREC	\$135	2014	\$135.00
Parjanya	Rijal	Expert	IREC	\$135	2014	\$135.00
Laurel	Passera	Advocate	IREC	\$80	2014	80.00
Laurel	Passera	Advocate	IREC	\$80	2015	80.00

(END OF APPENDIX)